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Elizabeth G. Eager

From: Elizabeth G. Eager
Sent: Tuesday, April 20, 2010 11:31 AM
To: 'Paul.Eckles@skadden.com'; 'richard.horvath@skadden.com'
Cc: Steven J. Rosenwasser; Nicole G. Iannarone
Subject: TASER Litigation Traders

Paul and Richard,

On August 12, 2009, the parties entered into a stipulation regarding the identification and production of documents from traders. Pursuant to that stipulation, Plaintiffs request that Merrill produce responsive documents from the following individuals: Michael Schorr, Jami Nazarali, Nick Abbate, Arben Celaj, Tom Liberty, B. Snedeker, J. Goldsmith, Chris Sula and Walter Roesche.

Plaintiffs understand the individuals listed above may be the head trader of a trading desk and that there could be multiple assistants to the head trader that have significant relevant communications with clients and departments within each defendant's operations. Therefore, we request that for each of these trading desks identified, you identify the persons reasonably likely to have responsive information, you search those persons electronically-stored information and produce any responsive materials.

Pursuant to the stipulation, responsive information is due within 30 calendar days from today. Plaintiffs explicitly reserve the right to request information about additional traders (we are providing a partial list now in order to expedite the process, but we expect our continuing review is likely to identify other traders).

Thank you,
Liz Eager

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